



August 15, 2019

Regional Freedom of Information Officer  
U.S. EPA, Region 1 (OARM01-6)  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912  
(617) 918-1102

**Re: Freedom of Information Act Request**

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, I am requesting copies and/or access to records held at EPA's Region 1 office.

Records of interest include documents created, compiled, and submitted to the EPA under regulatory programs such as the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA), Clean Air Act (CAA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

Specifically, I am requesting release of a number of specific documents and types of documents held at Region 1 concerning a site in East Providence, Rhode Island. Below, I have included information on the site occupant's name, address(es), any available facility ID numbers, and the types of documents requested. The following sections are arranged according to specific EPA regulatory programs.

I believe that the site occupant generally is or was known as Organic Dyestuffs, Organic Dyestuffs & Pigments, and Organic Chemical Company, but it may also have been known or referred to as Fox Chemical, Old Fox Chemical, or Fox Fertilizer.

*RCRA Requested Documents*

We understand that hazardous waste generated by Old Fox Chemical at 66 Valley Street, East Providence, RI was regulated under the Resource Conservation and Recovery Act (RCRA) and was assigned the following RCRA facility ID: RID050324987.

We request the following materials relating to this facility produced by the company as required by RCRA:

- RCRA Notification
- Inspections and correspondence for the period 1985 and earlier
- Work plans and closure documentation related to contamination processes and chemical releases
- Biennial hazardous waste reports from 1981 to 1987
- Any RCRA Part B application and related correspondence

#### TRI Requested Documents

We understand that Organic Dyestuffs at 65-84 Valley Street, East Providence, RI was required to file an annual report with the EPA's Toxics Release Inventory (TRI) Program to document the release of certain chemicals. The company was assigned the following TRI facility ID: 02914RGNC7484V.

We therefore request any annual reports/ submittals filed for the 1987 reporting year (also known as "Form R") filed by the company.

#### AIR Requested Documents

We understand that Organic Dyes and Pigments LLC at 65-84 Valley Street, East Providence, RI operated under the regulation of the Clean Air Act with the following facility ID: RI0000000000000001-AIR 1689-677.

We therefore request the following documents related to this facility:

- Air permit registration and application documents
- Inspection files
- Correspondence for 1990 and earlier

#### TSCA Inventory Requested Documents

We understand that, under the chemical inventory provisions of the Toxic Substances Control Act (TSCA), Organic Dyestuffs at 74-84 Valley Street, East Providence, RI identified certain chemicals used at this site and was assigned the following facility ID: 19880202NEIC1. We therefore request the following documents related to these facilities produced as required by TSCA:

- Inspection reports
- Chemical inventories
- Enforcement actions related to Section 5 Failure to Notify

We also understand that, under the chemical inventory provisions of the Toxic Substances Control Act (TSCA), Organic Dyestuffs at 65 Valley Street, East Providence, RI identified certain chemicals used at this site and was assigned the following facility IDs: 100607358, 200003254, and TSCA7838. We therefore request the following documents related to these facilities produced as required by TSCA:

- 1986 Reporting Year Data
- 1990 Reporting Year Data

#### TSCA PCB Regulations

We understand that, under the PCB regulations adopted pursuant to section 6 of the Toxic Substances Control Act, that PCB waste materials may have been used or remediated at Organic Dyestuffs, Organic Dyes & Pigments, Fox Fertilizer, and Fox Chemical at 62-84 Valley Street, East Providence, RI.

We therefore request the following documents related to PCBs and these installations:

- Documentation of any PCB related notifications, inspections, and enforcement actions involving these locations or parties.

*Request Information*

History Associates requests the release of the above materials. If this is not possible, we request information as to why, as we understand that these collections are publically accessible under statutory regulations.

History Associates agrees to pay all reasonable and standard processing fees authorized by 5 U.S.C. 552(a)(4)(A) and the applicable regulations up to \$250. Should the fees exceed this amount, please call or email me with an estimate of the total costs in order that specific expenditures beyond \$250 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email at [HBergen@historyassociates.com](mailto:HBergen@historyassociates.com).

Sincerely,

Hilary Bergen